

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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JOAN M. AVON, et. al.,	:	
Plaintiff(s)	:	
-vs-	:	Civil Action No. 13-7530(FLW)
T&N LIMITED, et al.,	:	
Defendant(s).	:	

**NOTICE OF MOTION FOR ADMISSION PRO HAC VICE**

PLEASE TAKE NOTICE that pursuant to the Federal Rules of Civil Procedure and Rule 101.1(c) of the Rules of the United States District Court for the District of New Jersey, and upon filing with the Clerk of the District Court the Declaration of John E. Herrick, dated March 14, 2014, the undersigned moves this Court for an Order permitting John E. Herrick to be admitted *Pro Hac Vice*, in order to appear and participate in the above-captioned actions on behalf of the Plaintiffs.

Dated: April 9, 2014

BY: s/Christopher Placitella  
s/William L. Kuzmin  
COHEN, PLACITELLA & ROTH  
127 Maple Avenue  
Red Bank, NJ 07701  
(732) 747-9003

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9<sup>th</sup> day of April 2014, a copy of the Notice of Motion for Admission Pro Hac Vice, Declaration of John E. Herrick and Proposed Order were filed with the Clerk of Court of the United States District Court for the District of New Jersey and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF)

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s/William L. Kuzmin  
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